UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

CATELIN CLOBES,

Civil Action No. 21-cv-02117-P.JS-JFD

Plaintiff,

VS.

NBCUNIVERSAL MEDIA, LLC, BRANDY ZADROZNY, and ALIZA NADI,

MOTION TO DISMISS
PLAINTIFF'S SECOND AMENDED
COMPLAINT
BY DEFENDANT
NBCUNIVERSAL MEDIA, LLC

Defendants.

Defendant NBCUniversal Media, LLC ("NBC"), hereby moves, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the Second Amended Complaint filed by Catelin Clobes with prejudice for failure to state a claim upon which relief can be granted.

WHEREFORE, NBC respectfully requests that the Court enter an order granting its Motion to Dismiss and dismissing the Second Amended Complaint with prejudice.

Dated: April 27, 2022 BALLARD SPAHR LLP

/s/ Leita Walker

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Media, ĽLC